

HONORABLE KYMBERLY K. EVANSON

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

DOUGLAS BISHOP, as an individual, and as
Personal Representative for the ESTATE OF
QUINCY BISHOP, and on behalf of B.G.B. and
M.D.B, minors, VICTORIA BISHOP, as an
individual, CORY BISHOP and KIARA
BISHOP and the marital community comprised
thereof;

Plaintiffs,

v.

CITY OF BUCKLEY, a political subdivision of
the State of Washington d/b/a Buckley Police
Department, ARTHUR FETTER, an individual
and KURT ALFANO, an individual;

Defendants.

No. 3:22-cv-05759 KKE

STIPULATED PROTECTIVE ORDER

I. STIPULATION

1. COME NOW the parties, by and through their attorneys, and stipulate as follows: Pursuant to FRCP 26(c), it is hereby agreed that certain documents pertaining to the mental health of some of the parties to this matter are confidential and should therefore be subject to a protective order limiting dissemination.

1 2. Specifically, the parties hereby agree that the following documents are deemed
2 “confidential” and therefore subject to the terms described below:

- 3 • Any and all reports or documents pertaining to Defendant Arthur Fetter’s
4 psychological assessment which was conducted as a part of his application for
5 employment with the City of Algona;
6 • Any and all records, documents, or other information regarding the mental,
7 psychological, and emotional health of Plaintiff Cory Bishop, including, but
8 not limited to: records regarding the psychological assessments conducted by
9 the parties’ respective forensic psychological experts in this matter, any and all
10 medical records regarding treatment, evaluation, or assessment of Cory
11 Bishop, and any and all other documents, records, or information regarding
12 Cory Bishop’s mental health.

13 3. The parties agree that the information described in Paragraph 2 shall not be
14 disseminated outside of proceedings related to this litigation.

15 4. The parties further agree that they, as well as their attorneys, shall be bound by
16 this Agreement and Order. The parties further agree that they will instruct all witnesses,
17 expert and lay, that they shall be bound by this Agreement and Order.

18 5. The parties further agree that this Agreement and Order will hereby apply
19 retroactively to documents, records, and information falling under the categories outlined in
20 Paragraph 2 that was previously disclosed in discovery in this matter.

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1 Dated this 13th day of December, 2023.

2 ATTORNEYS FOR PLAINTIFFS:

ATTORNEYS FOR DEFENDANTS:

3 CONNELLY LAW OFFICES, PLLC

EVANS CRAVEN & LACKIE, P.S.

4 */s Samuel J. Daheim*

/s Andrew D. Brown

5 By: _____

John R. Connelly, Jr., WSBA No. 12183

Meaghan M. Driscoll, WSBA No. 49863

Samuel J. Daheim, WSBA No. 52746

By: _____

Michael McFarland, WSBA # 23000

Andrew D. Brown, WSBA No.

7 **II. ORDER**

8 The parties' stipulated motion (Dkt. No. 27) is GRANTED. The parties and all
9 witnesses shall be bound by the terms of the above stipulations.

10 DATED this 14th day of December, 2023.

11 

12 _____
13 Kimberly K. Evanson

14 United States District Judge